

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

)	
In the Matter of)	
)	
Lifeline and Link-Up)	WC Docket No. 03-109
)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation, on behalf of its incumbent local telephone, competitive local telephone, wireless and long distance operations, submits its comments in response to the Wireline Competition Bureau's Public Notice issued in the above-captioned proceeding.¹ In that Public Notice, the Bureau sought comment on various requests for waiver and requests for declaratory ruling, listed in n. 1 of the Public Notice, regarding the Lifeline rules.

Sprint's incumbent local telephone companies serve as incumbent eligible telecommunications carriers ("ETCs") in each of the eighteen states in which they operate. Sprint's wireless operations also serve as competitive eligible telecommunications carriers ("C-ETCs") in eighteen additional states, plus Puerto Rico. In all of these states, Sprint offers Lifeline discounts consistent with the respective state or federal requirements. However, in particular states, Sprint's wireless operations face the situation described by several of the requesting parties: certain states have mandated Lifeline support but do not

¹ *Wireline Competition Bureau Seeks Comment on Requests for Waiver and Declaratory Ruling Concerning Lifeline Rules*, Public Notice, DA 05-1869 released June 28, 2005.

impose certification or verification requirements on CMRS carriers. Therefore it is unclear exactly which verification requirements CMRS carriers should follow.

In order to bring needed certainty and consistency to the verification process, Sprint strongly supports the petitioners' request for a declaratory ruling regarding Lifeline verification guidelines. In that ruling, the Commission should find that when a state commission does not accept verification information for certain Lifeline customers within that state—namely, wireless customers—an affected carrier in that state should follow the FCC's Federal default guidelines included in 47 C.F.R. Section 54.410. This will ensure consistent compliance with all regulatory obligations as an ETC.

In addition, in light of the above-mentioned uncertainty facing CMRS carriers in certain states, Sprint supports the petitioners' request for a waiver of 47 C.F.R. Section 54.410(c)(2) in the form of an additional 90 days (beyond the stated June 22, 2005 deadline) to submit the required verification data. Sprint believes that such a waiver would help to ensure the most accurate reporting of data possible and that the benefits associated with such increased accuracy outweigh any cost or inconvenience associated with strict compliance with the stated deadline.

In summary, Sprint encourages the Commission to grant the petitioners' request for declaratory ruling and request for waiver in this matter.

Respectfully submitted,

SPRINT CORPORATION

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July 13, 2005

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **COMMENTS OF SPRINT CORPORATION** in WC Docket 03-109 was filed by electronic mail on this the 13th day of July, 2005 to the following parties.

Christine Jackson

July 13, 2005

BY ELECTRONIC MAIL

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